

U.S.C. § 102(e); and claims 4 and 11 were rejected under 35 U.S.C. § 103.

The applicant has not amended the application or claims. Reconsideration of the rejection of the claims is requested as set forth below.

Objection to the Specification and Rejection of Claims 1-4, 6-11 and 13 Under 35 U.S.C. § 112, First Paragraph.

The Examiner objected to the specification and rejected 1-4, 6-11 and 13 under 35 U.S.C. § 112, first paragraph, on the basis that "the specification as originally filed, does not provide support for the invention as is now claimed." (Official Action, page 2). The rejection is objected to because it is not clear exactly what aspect of Section 112, first paragraph is being relied upon for the rejection. In particular, applicant is not sure whether the Examiner is relying on a written description requirement, the enablement requirement or the best mode requirement as a basis for the rejection. Clarification of the rejection is respectfully requested, and it is submitted that no final action may be issued until the rejection is clearly set forth.

Applicant has attempted to reach the Examiner by telephone, but has been unsuccessful prior to filing of the response.

Furthermore, it is submitted that the specification unquestionably supports the claims under all three requirements of Section 112, first paragraph. Indeed, applicant inserted references to the specification in the claims, showing such support. The application describes and enables the programs recited in the claims. Furthermore, it is submitted that the best mode has been disclosed in the application.

The Examiner's attention is drawn to the declaration under 37 C.F.R. § 1.132, which was filed in the parent application (Application No. 08/000,927). This declaration establishes both enablement and written description of the invention set forth in the claims now in the application, as well as of the claims as they existed at the time of the declaration.

Accordingly, clarification, or withdrawal of the rejection of all claims under 35 U.S.C. § 112, first paragraph, is respectfully requested.

Rejection of Claims 1, 2, and 7-9 Under 35 U.S.C. § 102(b)

The Examiner rejected claims 1, 2 and 7-9 under 35 U.S.C. § 102(b) as

anticipated by Naimark, *et al.*. However, the Naimark, *et al.* reference does not disclose the "processing resources, connected with the tag storage and the video storage, including a first program routine which assembles a content video image in response to the tags, the content video image including positions for corresponding frames of video data in the plurality, and the processing resources including a second program routine which associates positions in the content video image with addresses of storage locations storing corresponding frames of video data."

The Naimark, *et al.* patent fails to describe any system whatsoever for assembling the content video image in reliance on the tags as recited in claim 1.

Accordingly, rejection of claim 1 and claim 2, which depends on claim 1, as anticipated by Naimark, *et al.* is believed in error.

As to claim 7, the Naimark, *et al.* reference fails to disclose the step of executing a program which "assembles and displays a content video image in response to the tags, the content video image including positions indicating the content of corresponding frames of video data in the plurality;". Accordingly, Naimark, *et al.* fails to anticipate claim 7, and claims 8 and 9 which depend from claim 7.

Accordingly, reconsideration of the rejection of claims 1, 2, and 7-9 as anticipated by Naimark, *et al.* is respectfully requested.

#### Rejection of Claims 3, 6, 10 and 13 Under 35 U.S.C. § 102(e).

The Examiner rejected claims 3, 6, 10 and 13 under 35 U.S.C. § 102(e) as anticipated by Morgan. This rejection is respectfully traversed and reconsideration is requested.

As to the claim 3, the Morgan reference fails to disclose:

"a content image display which displays a content video image representative of an organization of content addressable video, the content video image having positions within the content video image corresponding to desired content of video image to be displayed;

a controller, in communication with the content image display, which generates control signals indicating content for video images in response to respective positions in the content video image."

Furthermore, the Morgan reference does not include the data processing resources recited in the claim which include "a program routine which associates the addresses of the stored frames of video data with respect to positions in the content video image."

As to claim 6, the Morgan fails to disclose a monitor which is responsive to input to display frames of video from the video storage as recited in the claim. Furthermore, claim 6 distinguishes over the reference for at least the same reason as claim 3 from which it depends.

As to claim 10, the Morgan fails to describe the step of "executing a program with data processing resources which generates control signals indicating a content for a video image in response to the selected positions within the content video image;". Also, Morgan does not teach the step of "executing a program with data processing resources which associates the address of each frame of video data with a position in the content video image."

Similarly, as to claim 13, the Morgan reference does not describe the steps recited therein. Further, claim 13 distinguishes over Morgan for at least the same reasons as claim 10 from which it depends.

The Morgan reference has nothing to do with generating content addressable video frames, as recited in claims 3, 6, 10 and 13 in the present application. Rather, Morgan describes a close circuit television network. Once the video has been shot and stored by the system of Morgan, there is no structure similar to that being claimed in the present application for retrieving video frames according to content. Accordingly, the Examiner's reading of Morgan is believed incorrect.

Therefore, reconsideration of the rejection of claims 3, 6, 10 and 13 under 35 U.S.C. § 102(e) is respectfully requested.

Rejection of Claims 4 and 11 Under 35 U.S.C. § 103.

The Examiner rejected 4 and 11 under 35 U.S.C. § 103 as unpatentable over Morgan, in view of the 1985 ICAR paper by Toshiba Corporation.

Claim 4 depends from 3 and claim 11 depends from claim 10. Thus, claims 4 and 11 are believed allowable for at least the same reasons as their parent claims. Furthermore, the 1985 ICAR paper cited by the Examiner does not describe the use of robot-mounted video cameras in the system claimed. Accordingly, reconsideration of the rejection of claims 4 and 11 under 35 U.S.C. § 103 is respectfully requested.

**CONCLUSION**

It is submitted that the present application is in form for allowance, and such action is respectfully requested.

Respectfully submitted,

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